

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 08 CR 276
vs.)	
)	Judge Blanche M. Manning
WILLIAM COZZI)	

**GOVERNMENT’S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE RESPONSE BRIEF**

The United States of America, by its attorney, PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, respectfully moves this Court to grant the government up to and including July 25, 2008, to respond to defendant’s pretrial motions. In support of its motion, the government states as follows:

1. On June 2, 2008, defendant filed pretrial motions seeking: (a) a taint hearing; (b) a vindictive prosecution hearing; (c) discovery related to the requested taint hearing; and (d) dismissal of the indictment.

2. The government’s response to the pretrial motions is currently due on June 27, 2008. The government seeks an extension up to and including July 25, 2008, to file its response.

3. Defendant’s motions raise complex legal issues that the government is currently researching. The government seeks additional time to continue researching the issues raised in the motions and prepare a proper response.

4. Scott R. Drury, one of the attorneys prosecuting the case, is currently preparing for trial in the matter of *United States v. Loniello, et al.*, 07 CR 336, which is scheduled to begin on July 14, 2008.

5. The government has spoken with Terrence Gillespie, counsel for defendant. Mr. Gillespie has no objection to the government's motion.

6. Defendant is not in custody.

WHEREFORE, the United States of America respectfully requests that this Court enter an order granting the government up to and including July 25, 2008, to file its response to defendant's pretrial motions.

Dated: June 26, 2008

Respectfully submitted,
PATRICK J. FITZGERALD
United States Attorney

By: Scott R. Drury/s
SCOTT DRURY
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CERTIFICATE OF SERVICE

The undersigned Assistant United States Attorney hereby certifies that the following document:

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was served on June 26, 2008, in accordance with FED. R. CRIM. P. 49, FED. R. CIV. P. 5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

Scott R. Drury/s

SCOTT DRURY

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